

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Lawrence E. Kisslinger	:	
	:	Chapter 13
Debtor	:	
	:	Bankruptcy No. 14-20064 AMC
Lawrence E. Kisslinger	:	
	:	
Movant	:	
v.	:	
	:	
Flagstar Bank, FSB	:	
	:	
Respondent	:	
	:	
	:	
	:	

**RESPONSE OF FLAGSTAR BANK, FSB TO MOTION TO REINSTATE AUTOMATIC
STAY OF FLAGSTAR BANK FSB**

Respondent, Flagstar Bank, FSB, by and through its attorneys, Phelan Hallinan Diamond & Jones, LLP, hereby responds to MOTION TO REINSTATE AUTOMATIC STAY OF FLAGSTAR BANK FSB and in support thereof, avers as follows:

1. Admitted.
2. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
3. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
4. Denied. Respondent is without information or knowledge sufficient to form a belief as to the truth of the within averment.
5. Denied. Respondent filed a motion for relief on October 14, 2016 which was resolved by way of a stipulation filed on December 8, 2016 and approved by the Court on December 12, 2016. Debtor violated the terms of the stipulation by again

falling into post-petition default. Debtor is presently post-petition due for May 2019 for a total post-petition arrearage in the amount of \$6,445.19.

6. Denied. Relief should not be reinstated unless Debtor is able to fully cure the post-petition arrearage.

WHEREFORE, Respondent, Flagstar Bank, FSB respectfully requests that this Honorable Court deny MOTION TO REINSTATE AUTOMATIC STAY OF FLAGSTAR BANK FSB in its entirety.

Respectfully submitted,

Date: October 21, 2019

/s/ Thomas Song, Esquire
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